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agreement to release an equitable interest in land cannot be oral. See *Gough v. Dorsey* (1870) 27 Wis. 119, 134. A parol agreement to rescind a written contract for the sale of land is unenforceable. See *Catlett v. Dougherty* (1886) 21 Ill. App. 116, 118. Conversely, a parol agreement to enter into a written contract for the sale of land should be prohibited: a conclusion in accord with the decision in the principal case.

TORTS—FALSE STATEMENT—CONSEQUENT MENTAL SHOCK AND ILLNESS.—The defendant falsely told T that the plaintiff's absent son had committed suicide. T told the plaintiff's daughter who repeated it to the plaintiff who suffered shock and illness. *Held*, for the plaintiff. *Bielitzki v. Obadisk* (K. B. Sask. 1921) 3 W. W. R. 229.

There can be a recovery for internal injuries resulting from shock purposely caused by making a false statement. *Wilkinson v. Downton* [1897] 2 Q. B. 57. Such recovery is governed by the rules of legal cause and not by those of defamation. If a wrongful act is committed consciously the defendant is liable for many remote consequences. *Cribbs v. Stiver* (1914) 181 Mich. 82, 147 N. W. 587. One is liable for negligently placing another in a position where the latter is injured by the immediate act of a third person. *Fine v. Interurban St. R. R.* (1904) 45 Misc. 587, 91 N. Y. Supp. 43. In many jurisdictions there may be a recovery for internal injuries resulting from shock due to negligence. *Dulieu v. White* [1901] 2 K. B. 669; *Kimberly v. Howland* (1906) 143 N. C. 398, 55 S. E. 778. However some jurisdictions hold *contra*. *Smith v. Postal Tel. Cable Co.* (1899) 174 Mass. 576, 55 N. E. 380; *Mitchell v. Rochester Ry.* (1896) 151 N. Y. 107, 45 N. E. 354. However, if the negligence causes some external injury damages for the mental injuries can be recovered. *Cameron v. New England Tel. & Tel. Co.* (1902) 182 Mass. 310, 65 N. E. 385. But a defendant is not liable for his negligent act unless the result is a probable consequence thereof. *Clark v. Gay* (1901) 112 Ga. 777, 38 S. E. 81. The decision in the instant case is correct if the defendant knew the statement to be false; also, as the jurisdiction follows *Dulieu v. White, supra*, if, though he negligently believed it to be true, it was likely to come to the attention of the plaintiff. If he believed it to be true and it was improbable and unforeseen by him that it would be heard by the plaintiff the decision was incorrect.